



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Applications by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc.,	)	CC Docket No. 97-208
and BellSouth Long Distance, Inc., for	)	
Provision of InterLATA Services	)	
in South Carolina	)	

**AFFIDAVIT OF JOSEPH GILLAN  
ON BEHALF OF  
THE COMPETITIVE TELECOMMUNICATIONS ASSOCIATION**

State of Montana	)
County of Missoula	)

I, Joseph Gillan, being first duly sworn upon oath, do hereby depose and state as follows:

1. My name is Joseph Gillan. I am a consulting economist with a practice specializing in the telecommunications industry. My business address is P.O. Box 541038, Orlando, Florida 32854.
2. I am a graduate of the University of Wyoming where I received B.A. and M.A. degrees in economics. For the past 17 years I have been actively involved applying economic principles to a wide range of issues as the telecommunications industry has taken its slow but continuous turn from monopoly to competition.
3. From 1980 to 1985, I served on the staff of the Illinois Commerce Commission where I had responsibility for policy analysis relating to the emergence of competition in regulated markets. While at the Commission, I served on the staff subcommittee for the NARUC Communications Committee and was appointed to the Research Advisory Council overseeing NARUC's research arm, the National Regulatory Research Institute.
4. My background includes the position of Vice President-Marketing & Strategic Planning for U.S. Switch, a venture firm organized to develop interexchange access networks in partnership with independent local telephone companies. I currently serve on the Advisory Council for New Mexico State University's Center for Regulation.

5. BellSouth's application for interLATA authority in South Carolina partially rests upon its assertion that no CLEC has taken reasonable steps to provide facilities-based residential services. As the following analysis shows, however, the principal entry barrier to the South Carolina residential market has been BellSouth's refusal to provide entrants nondiscriminatory access to network elements -- an absolute prerequisite to entry on a commercial scale.

6. During the period relevant to BellSouth's claim,<sup>1</sup> BellSouth's obligation to provide nondiscriminatory access included compliance with CFR Rule §51.315(b) prohibiting the unnecessary separation of requested network elements. As I explain below, BellSouth's refusal to comply with §51.315(b) created a cost-barrier that effectively foreclosed facilities-based entry to the residential market.<sup>2</sup>

7. Although Rule § 51.315(b) has now been vacated, BellSouth's obligation to provide non-discriminatory access to network elements remains. The entry barrier created by physically separating network elements will continue to foreclose residential competition until BellSouth provides entrants the nondiscriminatory access they *now* require to reconnect disrupted network elements -- that is, implementing automated systems to separate network elements, and providing entrants non-discriminatory access to these same automated systems to recombine facilities.<sup>3</sup>

### **The Additional Costs of Mandatory Network Disruption**

8. Local competition depends upon entrants having cost-effective and efficient means to access network elements. As a general proposition, the smaller the target customer, the more important is the cost to access and use network elements. A primary reason that residential local competition has not yet developed in South Carolina (or elsewhere in the BellSouth region) has been BellSouth's refusal to comply with Commission rules intended to assure non-discriminatory access, in particular CFR Rule §51.315(b) prohibiting the separation of network elements.

9. Although CFR Rule §51.315(b) is now vacated, BellSouth's refusal to comply with

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<sup>1</sup> BellSouth's Brief argues that "[n]o potential provider had taken any substantial steps to offer facilities-based service to residential customers as of three months ago, which is the relevant time under "Track B." Brief in Support of Application by BellSouth for Provision of In-Region, InterLATA Services in South Carolina, page iii.

<sup>2</sup> The Commission has determined that network elements should be considered an entrant's "own" facilities for the purpose of evaluating facilities-based competition.

<sup>3</sup> The entry-barriers created by the Eighth Circuit's decision to permit physical disruptions to the network can be minimized by implementing fully automated systems to replace the manual processes which underlie BellSouth's application. By fully automating the processes used to separate loops and ports, the principal disadvantages created by physically separating network elements -- i.e., unnecessary service outages, delays transferring customers to new carriers, and higher costs -- should be reduced significantly.

§51.315(b) while the rule *was* effective created a significant barrier to the residential market. The physical disruption of network elements (which §51.315(b) was intended to prevent) has five principal effects which limit the entrant's ability to serve residential customers.<sup>4</sup> These consequences include: (a) an unnecessary service outage when a customer changes local carriers, (b) the additional cost to separate combined elements, (c) the additional cost to reconnect separated elements, (d) the higher probability of human error caused by the insertion of unnecessary manual processes, and (e) an additional delay transferring customers to new local providers.

10. Before addressing the higher costs created by the forced separation of network elements, it is useful to understand that the above cited non-cost factors themselves discourage customers from changing local carriers and thus constitute a barrier to entry. For instance, requiring that network elements be separated before they may be used by an entrant assures that a customer will lose service when changing to another local carrier. Not only will the threat of this outage discourage customers from changing carriers, but this requirement places customers in potential jeopardy by isolating them from emergency services, including fire, police and health care. Second, the manual systems by which BellSouth proposes separate network elements increase the probability of human error and will delay the efficient transfer of customers to new local providers.

11. The forced separation of network elements also increases cost in two significant ways. First, there are the unnecessary costs associated with actually separating network elements before providing the entrant with access. The difference between the non-recurring cost of a fully automated transfer of an unseparated loop/port combination, and the higher charge to provide a separated loop and port, is the principle source of the additional costs this policy imposes on entrants.

12. Second, the entrant incurs additional costs to reconnect the loop and port to its original configuration. These costs would include additional charges from BellSouth to establish a collocation cage where the loop and port elements may be reconnected, as well as the entrant's internal costs to perform the connection itself.

13. The appropriate measure of the first category of costs are BellSouth's proposed non-recurring charges for a separated loop, port and cross-connection.<sup>5</sup> In South Carolina, these non-

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<sup>4</sup> Significantly, none of these consequences apply when BellSouth uses network elements in its own services and are, as a result, inherently discriminatory.

<sup>5</sup> BellSouth's cost studies indicate that these charges are intended to reflect the cost of the manual processes used to separate network facilities. Without endorsing the accuracy of these studies, these charges do represent additional costs to the entrant to obtain separated (as opposed to combined) network elements.

recurring charges total \$109.20 per subscriber line.<sup>6</sup> This total consists of the non-recurring charges for a 2 wire analog loop (\$51.20), a 2-wire port (\$50.00),<sup>7</sup> and a loop cross-connect (\$8.00).

14. To determine what portion of the \$109.20 cost represents an *unnecessary* cost, it is appropriate to subtract an estimate of the non-recurring cost of a fully automated loop/port combination. One estimate of this cost would be BellSouth's cost to implement a change in the presubscribed interexchange carrier. A PIC-change involves switch translations that are analogous to a change in local provider when loop and port elements are not physically disconnected.

15. BellSouth's estimate of the cost to process a mechanized PIC-change in South Carolina is \$0.80<sup>8</sup>. There are a number of reasons to conclude that BellSouth's PIC-change study may overstate today's TELRIC cost to process a switch translation. For instance, the study was performed in 1990 and decreases in processor costs in the past 7 years have been substantial. The point, however, is that even accepting BellSouth's historic cost of \$0.80 as a reasonable estimate of the TELRIC of an automated loop/port transfer, the *unnecessary* costs created by the forced separation of the requested elements is still approximately \$108.00 per line.

#### **The Additional Costs of Mandatory Separation Create an Effective Barrier to Residential Competition**

16. Using information describing the residential customer base in South Carolina, it is possible to calculate the effectiveness of the additional costs caused by the forced separation of network elements as a barrier to entry. As explained below, this additional cost of \$108.00 per line reduces the potentially addressable residential market from approximately 85% of the customers to approximately 30% (or less).<sup>9</sup>

17. Exhibit JPG-1 compares the additional costs caused by the separation of network elements

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<sup>6</sup> This calculation is based on the non-recurring charges contained in BellSouth's SGAT. It should be noted that BellSouth's final charges in South Carolina have not yet been established. Although UNE elements "placed in service" prior the conclusion of the South Carolina PSC's cost investigation may not be increased above the rates in BellSouth's SGAT, any new and higher rates would apply to all future UNE orders.

<sup>7</sup> This is the non-recurring charge that applies to the first port. The charge applicable to additional ports is \$18.00. Because the analysis is intended to primarily address the single-line residential market, only the charge applicable to the first port is considered.

<sup>8</sup> BellSouth's cost analysis was provided in support of its \$1.49 PIC change charge in its interstate access tariff.

<sup>9</sup> For purposes of this analysis, a customer is considered "potentially addressable" if its monthly local revenues exceed the cost of the basic network elements necessary to serve it.

to the distribution of residential monthly local revenue (including the subscriber line charge) for the month of October, 1994. The distribution of local revenues was provided by BellSouth to Commission as part of the universal service investigation.<sup>10</sup>

18. To identify what portion of the residential market is potentially addressable requires an estimate of the basic network cost to provide service. Using BellSouth's proposed charges in its SGAT, the estimated cost of the basic facilities-platform to provide local service in South Carolina is \$24.34 per month. This platform cost consists of the recurring rates for a 2 wire analog loop (\$18.00), a 2 wire analog port (\$2.70) with 760 minutes of local usage (\$2.28),<sup>11</sup> a cross-connect (\$0.50) and the shared transport necessary to complete interswitch local calls (\$0.86).<sup>12</sup>

19. As shown on Exhibit JPG-1, approximately 85% of the residential market in South Carolina has average monthly local revenues greater than \$24.00/month. Consequently, a sizeable portion of the residential market would potentially attract competition if not for the additional costs associated with first separating, then recombining, the network elements necessary to provide service.

20. Assuming that entrants are willing to amortize these substantial (i.e., \$108.00 per line) non-recurring costs over an entire year -- a risky proposition in an environment of month-to-month services<sup>13</sup> -- the cost of the basic facility-platform increases to over \$33.00 per month.<sup>14</sup> BellSouth's revenue distribution shows that this increase in cost reduces the potentially addressable residential market to less than 29%.

21. The more unstable the customer base, the shorter the amortization window, and the smaller the potentially addressable market. If non-recurring costs are recovered over 8 months, the cost increase is \$13.55 per month and the addressable residential market is only 11%. If non-

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<sup>10</sup> See Order, CC Docket 80-286, Universal Service Fund Data Request, released December 1, 1994.

<sup>11</sup> Average local usage was calculated by dividing 1993 BellSouth's local DEM minutes of use by two to approximate conversation minutes.

<sup>12</sup> The monthly cost of shared transport assumes 40% of the traffic is intraswitch and the remainder uses 10 miles of shared transport with 25% routed through the tandem.

<sup>13</sup> BellSouth's Universal Service data (lines 169 through 174) indicates that residential access lines in 1992 only grew by 22,938 lines, while total residential connections numbered 156,859. This implies a residential churn of 133,921 (or 16.3%), even in a completely monopoly environment. This suggests that entrants must recover non-recurring charges rapidly because, unless an environment of residential-contracting develops and is accepted quickly, the entrant's residential customer base will likely be unstable.

<sup>14</sup> Specifically, the additional costs created by the forced separation of network elements increases the non-recurring cost by \$9.03 per month if amortized over 12 months.

recurring costs must be recovered in 6 months, the additional cost is \$18.07, and the addressable residential market is less than 8%. The important point is that these additional costs -- incurred solely for the purpose of separating network elements needlessly -- will have a chilling effect on residential competition no matter which cost-recovery period the entrant concludes is appropriate.

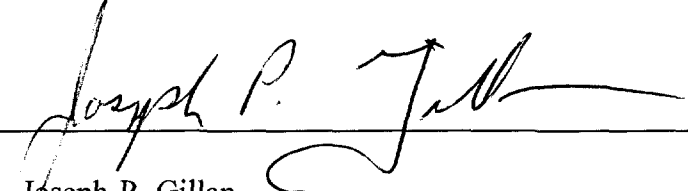
22. The above analysis does not consider two offsetting factors that would be relevant to a more detailed market analysis. On the one hand, a more complete comparison would include the potential revenues (and additional usage costs) associated with exchange access service. Unfortunately, a distribution of residential revenues that includes access service is not publicly available. By excluding access revenues and cost, however, the analysis provides an underestimate of the addressable residential market. Because this underestimate would affect the size of the potential residential market both before and after including the additional cost of network separation, the basic conclusion that these additional costs dramatically reduces the addressable market may not be affected.

23. On the other hand, the analysis does not consider the additional incurred by the entrant to recombine network elements. For instance, the analysis does not include an estimate of the average cost (per line) associated with the unneeded collocation cage and associated charges from BellSouth.<sup>15</sup> Nor does the analysis include an estimate of the entrant's own internal costs. Although it is unknown what net effect these offsetting considerations play, it is reasonable to conclude that the analyses' principal conclusion -- that BellSouth's refusal to provide entrants access to network element combinations -- has created an entry barrier which explains the absence of residential local exchange competition in South Carolina.

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<sup>15</sup> BellSouth has indicated that it may be willing to recombine network elements for an unspecified "glue charge". This charge, if included in the above analysis, is an additional entry barrier that would further limit the potentially addressable residential market.

I hereby swear, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Joseph P. Gillan

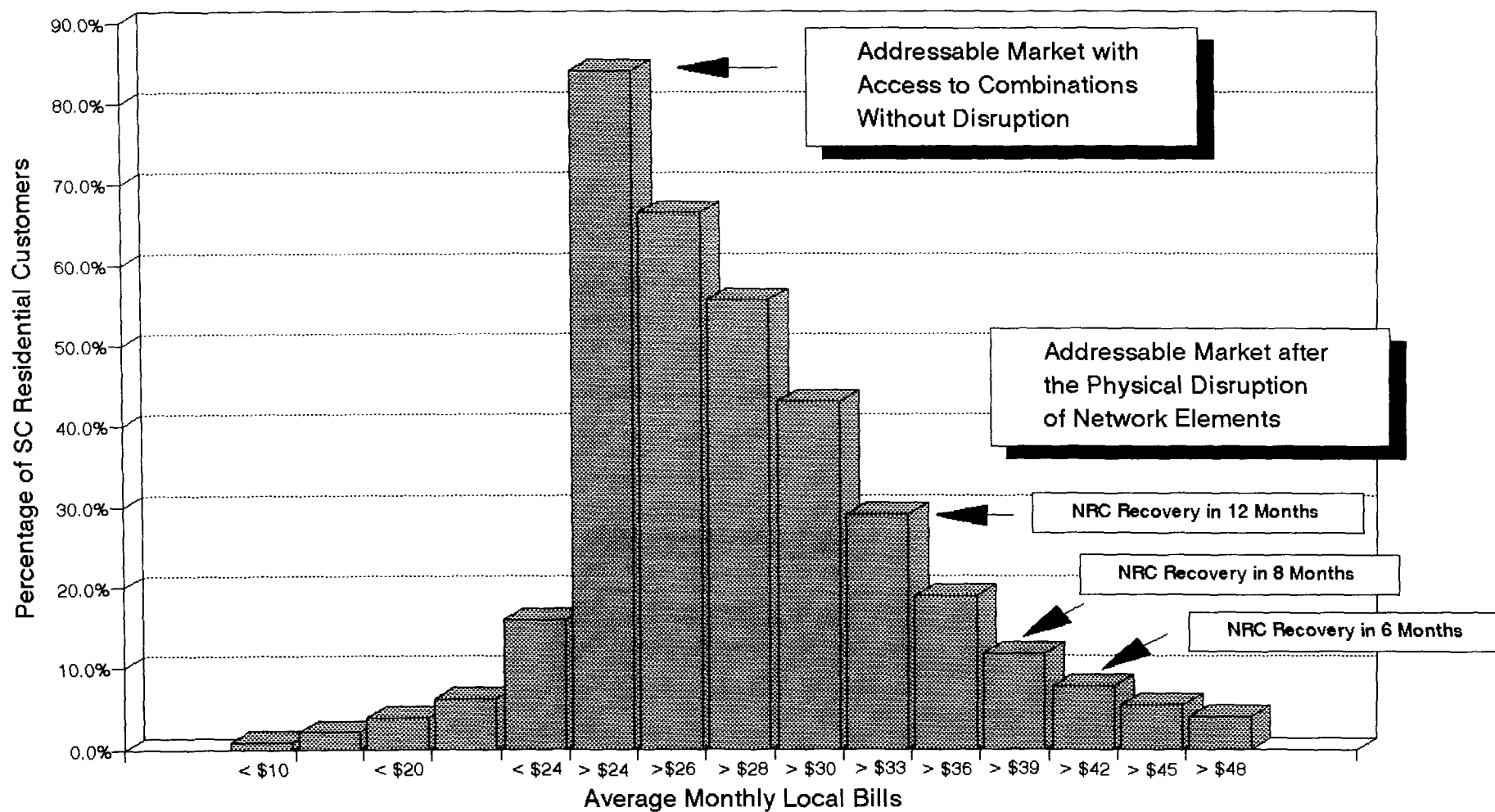
Subscribed and sworn to before me this 17th day of October, 1997.

  
\_\_\_\_\_

Notary Public  
my Commission exp.  
3-25-2001



## The Forced Separation of Network Elements Creates a Barrier to Residential Competition





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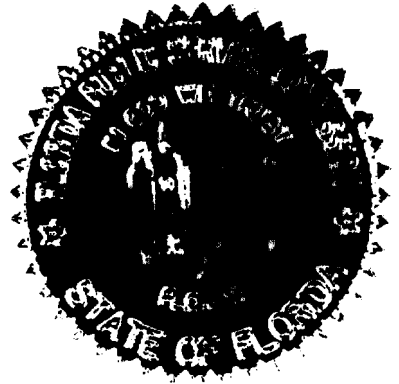
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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of

DOCKET NO. 960786-TL

Consideration of BellSouth  
Telecommunications, Inc.'s  
Entry into interLATA services  
pursuant to Section 271 of the  
Federal Telecommunications  
Act of 1996.



SECOND DAY - MORNING SESSION

VOLUME 7

Pages 732 through 919

PROCEEDINGS:

HEARING

BEFORE:

CHAIRMAN JULIA L. JOHNSON  
COMMISSIONER J. TERRY DEASON  
COMMISSIONER SUSAN F. CLARK  
COMMISSIONER DIANE K. KIESLING  
COMMISSIONER JOE GARCIA

DATE:

Wednesday, September 3, 1997

TIME:

Commenced at 9:00 a.m.

PLACE:

Betty Easley Conference Center  
Room 148  
4075 Esplanade Way  
Tallahassee, Florida

REPORTED BY:

JOY KELLY, CSR, RPR  
Chief, Bureau of Reporting  
H. RUTHE POTAMI, CSR, RPR  
Official Commission Reporters

APPEARANCES:

(As heretofore noted.)

DOCUMENT NUMBER-DATE

FLORIDA PUBLIC SERVICE COMMISSION 880 SEP-35

**WITNESSES - VOLUME 7**

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1           **CHAIRMAN JOHNSON:** We're ready for our next  
2 witness.

3           **MR. CARVER:** BellSouth calls Keith Milner.

4                               - - - - -

5                               **W. KEITH MILNER**

6 was called as a witness on behalf of BellSouth  
7 Telecommunications, Inc. and, having been duly sworn,  
8 testified as follows:

9                               **DIRECT EXAMINATION**

10 **BY MR. CARVER:**

11           **Q**     Mr. Milner, would you please state your full  
12 name and your business address.

13           **A**     Yes. My name is Keith Milner. My business  
14 address is 675 West Peachtree Street, Atlanta,  
15 Georgia.

16           **Q**     By whom are you employed and in what  
17 capacity?

18           **A**     I'm employed by BellSouth  
19 Telecommunications, Incorporated as Director of  
20 Interconnection Operations.

21           **Q**     Did you cause to be prefiled in this case 41  
22 pages of direct testimony, including three exhibits?

23           **A**     Yes, I did.

24           **Q**     And did you also cause to be prefiled 39  
25 pages of rebuttal testimony?

1           A     Yes.

2           Q     Mr. Milner, do you have any changes to your  
3 direct or to your rebuttal testimony?

4           A     I have one change to my direct testimony.

5           Q     And what is that please?

6           A     It's on Page 30, at Line 11, to make a  
7 correction to the number "140 NPA/NXX codes," the  
8 correct number is "130 NPA/NXX codes."

9           Q     Do you have any other changes?

10          A     No, that's the only change.

11          Q     Mr. Milner, if I ask you the questions that  
12 appear in your prefiled testimony, would your answers  
13 be the same?

14          A     Yes, they would.

15               MR. CARVER: Madam Chairman, I'd like to  
16 request that Mr. Milner's direct and rebuttal  
17 testimony be inserted into the record as though read.

18               CHAIRMAN JOHNSON: It will be so inserted.

19               MR. CARVER: I'd like to have, please, his  
20 three exhibits marked for identification.

21               CHAIRMAN JOHNSON: Okay.

22               MR. CARVER: I believe 32 is the next  
23 number.

24               CHAIRMAN JOHNSON: Yes, sir, we're on 32.

25               MR. CARVER: He has three, I believe, all

1 together.

2           **CHAIRMAN JOHNSON:** We'll mark it as a  
3 Composite Exhibit 32. Short title, Composite 32 WKM-1  
4 through 3.

5           **MR. CARVER:** Thank you.

6           (Exhibit 32 marked for identification.)

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1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   DIRECT TESTIMONY OF W. KEITH MILNER  
3                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4                   DOCKET 960786-TL  
5                   July 7, 1997  
6  
7

8 Q.     PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
9           BELLSOUTH TELECOMMUNICATIONS, INC.  
10

11 A.     My name is W. Keith Milner. My business address is 675 West  
12           Peachtree Street, Atlanta, Georgia 30375. I am Director -  
13           Interconnection Operations for BellSouth Telecommunications, Inc.  
14           ("BellSouth" or "the Company"). I have served in my present role since  
15           February, 1996 and have been involved with the management of  
16           certain issues related to local interconnection, resale and unbundling.  
17

18 Q.     PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.  
19

20 A.     My business career spans over 27 years and includes responsibilities  
21           in the areas of network planning, engineering, training, administration  
22           and operations. I have held positions of significant responsibility with a  
23           local exchange telephone company, a long distance company and a  
24           research and development laboratory. I have extensive experience in  
25           all phases of telecommunications network planning, deployment and



1 Q. HAS BELLSOUTH PROVIDED UNBUNDLED LOCAL SWITCHING  
2 FROM TRANSPORT, LOCAL LOOP TRANSMISSION, OR OTHER  
3 SERVICES, PURSUANT TO SECTION 271(c)(2)(B)(vi) AND  
4 APPLICABLE RULES PROMULGATED BY THE FCC? [ISSUE 7]  
5

6 A. Yes. Unbundled local switching is functionally available from  
7 BellSouth. BellSouth has a technical service description and has  
8 procedures in place for the ordering, provisioning, and maintenance of  
9 its switching services. (Volume 6-1). As of June 1, 1997, BellSouth  
10 has seven (7) unbundled switch ports in service in Florida, which  
11 evidences the functional availability of unbundled local switching from  
12 BellSouth. In its nine-state region, BellSouth has 26 unbundled switch  
13 ports in service (Volume 6-1).  
14

15 Q. PLEASE DISCUSS BELLSOUTH'S ABILITY TO BILL FOR LOCAL  
16 SWITCHING.  
17

18 A. Unbundled local switching includes a monthly port charge and usage (a  
19 per minute charge). A bill for the monthly charges can be system  
20 generated. The usage charges, however, contain several components  
21 and can vary by distance and the number of switches involved in  
22 completing the call. If an ALEC purchases unbundled switching from  
23 BellSouth, BellSouth will either render a manually calculated bill or  
24 retain the usage until a system generated bill is available, whichever  
25 the ALEC elects.

## CROSS EXAMINATION

BY MS. KAUFMAN:

Q Good morning, Mr. Milner.

A Good morning.

Q I'm Vicki Kaufman with the Florida Competitive Carriers Association. I'd like you to turn to your direct testimony, please, Page 21.

A Yes. I'm sorry. Yes.

Q Lines 21 through 25, please?

A Yes.

Q And in that passage there you testify, do you not, that BellSouth currently does not have the ability to electronically bill for usage sensitive UNES; is that right?

A That's correct. The term "electronically" was used yesterday. I prefer the term "mechanically" to imply something other than a manual process. But, yes, that's correct.

Q So to just be clear, they don't have the ability to bill electronically or in a mechanized way for usage sensitive UNES at this point in time?

A That's correct. For I believe there are two unbundled network elements that have a usage sensitive element as part of that charge, that's correct.

Q You heard Mr. Scheye testify yesterday, did

1 you not, in the same vein, that today you do not have  
2 the ability to provide a mechanized bill for switching  
3 or transport, the usage element?

4 A Yes, I heard that.

5 Q Mr. Milner, you do bill your retail  
6 customers, do you not, for usage sensitive services?

7 A It's true that BellSouth has some retail  
8 services that include a usage sensitive element to  
9 them, yes.

10 Q And this usage sensitive billing is done  
11 either on an electronic or mechanized basis for your  
12 retail customers?

13 A That's correct.

14 Q Mr. Milner, I'm going to show you some  
15 excerpts from the Ameritech order, and I have had it  
16 blown up. Ms. Rule is going to assist me. And I also  
17 have copies, eight-and-half by elevens for the parties  
18 and Commissioners. (Pause)

19 If you would take a minute to review that,  
20 please, while Ms. Rule is distributing copies, please.  
21 (Pause)

22 MS. KAUFMAN: Madam Chairman, I know we've  
23 taken official recognition of the Ameritech order but  
24 it might make the record clearer if we could have an  
25 exhibit number for these excerpts.



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BELLSOUTH TELECOMMUNICATIONS, INC.

2

DIRECT TESTIMONY OF W. KEITH MILNER

3

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

4

CASE NO. 97-AD-321

5

September 15, 1997

6

7

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
BELLSOUTH TELECOMMUNICATIONS, INC.

9

10 A.

My name is W. Keith Milner. My business address is 675 West  
Peachtree Street, Atlanta, Georgia 30375. I am Director -  
Interconnection Operations for BellSouth Telecommunications, Inc.  
("BellSouth" or "the Company"). I have served in my present role since  
February, 1996 and have been involved with the management of  
certain issues related to local interconnection, resale and unbundling.

16

17 Q.

PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

18

19 A.

My business career spans over 27 years and includes responsibilities  
in the areas of network planning, engineering, training, administration  
and operations. I have held positions of responsibility with a local  
exchange telephone company, a long distance company and a  
research and development laboratory. I have extensive experience in  
all phases of telecommunications network planning, deployment and  
operation (including research and development) in both the domestic

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Checklist Item VI

14 Q.

IS BELLSOUTH REQUIRED TO MAKE LOCAL SWITCHING

15

UNBUNDLED FROM TRANSPORT AND LOCAL LOOP

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TRANSMISSION AND OTHER SERVICES AVAILABLE TO CLECS?

17

18 A.

Yes, by the requirements of Section 251(c)(3) previously cited.

19

20

Section 271(c)(2)(B)(vi) also requires that BellSouth generally offer

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"[l]ocal switching unbundled from transport, local loop transmission, or

22

other services."

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24

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1 Q. DOES BELLSOUTH'S SGAT ADDRESS LOCAL SWITCHING  
2 UNBUNDLED FROM TRANSPORT, LOCAL LOOP TRANSMISSION  
3 AND OTHER SERVICES?  
4

5 A. Yes. In Section VI of the Statement, BellSouth offers a variety of  
6 switching ports and associated usage unbundled from transport, local  
7 loop transmission and other services. These include a 2-wire and 4-  
8 wire analog port, 2-wire ISDN port and 4-wire ISDN DS1 port, 2-wire  
9 DID port and 4-wire DID DS-1 port. Additional port types are available  
10 under the Bona Fide Request process. Until a long-term solution is  
11 developed, BellSouth provides selective routing on an interim basis to a  
12 CLEC's desired platform using line class codes subject to availability as  
13 ordered by this Commission.  
14

15 Q. HAS BELLSOUTH PROVIDED UNBUNDLED LOCAL SWITCHING  
16 FROM TRANSPORT, LOCAL LOOP TRANSMISSION, OR OTHER  
17 SERVICES, PURSUANT TO SECTION 271(c)(2)(B)(vi) AND  
18 APPLICABLE RULES PROMULGATED BY THE FCC?  
19

20 A. Yes. Unbundled local switching is functionally available from  
21 BellSouth. BellSouth has a technical service description and has  
22 procedures in place for the ordering, provisioning, and maintenance of  
23 its switching services. As of July 30, 1997, no CLEC in Mississippi had  
24 requested unbundled switch ports. In its nine-state region, however,  
25

1 BellSouth has 20 unbundled switch ports in service, which evidences  
2 the functional availability of unbundled local switching from BellSouth.

3

4 Q. PLEASE DISCUSS BELL SOUTH'S ABILITY TO BILL FOR LOCAL  
5 SWITCHING.

6

7 A. Unbundled local switching includes a monthly port charge and usage (a  
8 per minute charge). A bill for the monthly charges can be system  
9 generated. The usage charges, however, contain several components  
10 and can vary by distance and the number of switches involved in  
11 completing the call. If a CLEC purchases unbundled switching from  
12 BellSouth, BellSouth will either render a manually calculated bill or  
13 retain the usage until a system generated bill is available, whichever  
14 the CLEC elects.

15

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Checklist Item VII

18 Q. IS BELL SOUTH REQUIRED TO OFFER CLECS NON-  
19 DISCRIMINATORY ACCESS TO 911 AND E911 SERVICE?

20

21 A. Yes, by section 251(c)(3) previously cited.

22

23 Section 271(c)(2)(B)(vii) also requires that BellSouth generally offer  
24 "[n]ondiscriminatory access to 911 and E911 services."

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